

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MAHER ELSAYED,

Plaintiff,

vs.

LAKETA PENNINGTON, BULKMATIC
TRANSPORT COMPANY, and
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA.

Defendants.

CIVIL ACTION

FILE NO.: 1:17-cv-02366-SCJ

NOTICE TO TAKE VIDEOTAPED 30(B)(6) DEPOSITION

PLEASE TAKE NOTICE, that at 1:00 p.m. on March 16, 2018 at Regus Business Center, 111 West Jackson, Suite 1700, Chicago, IL 60604, the Plaintiff in the above-styled civil action will, pursuant to Federal Rules of Civil Procedure Rule 30(b)(6), proceed to take the videotaped deposition of the person with all information known or reasonably available to Bulkmatic Transport Company on the issues of safe driving practices, policies and procedures concerning safe driving practices, Defendant's compliance with federal regulations, drivers' logs and audits of drivers' logs, Defendant's investigation into the collision which is the subject matter of Plaintiff's complaint, Laketa Pennington's driving record and work history, Defendants' pleadings in this action, and Defendants' discovery responses, upon oral examination before an officer authorized by law to administer oaths and

to take videotaped deposition for the purposes of discovery and any other purpose allowed under the Federal Rules of Civil Procedure.

Dated on February 23, 2018.

Respectfully submitted,

FRIED ROGERS GOLDBERG LLC

/s/ Eric J.D. Rogers

MICHAEL L. GOLDBERG

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CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that the foregoing pleading complies with the font and point selections approved by the Court in Local Rule 5.1B. This brief has been prepared in Times New Roman font, 14 point.

By: /s/ Eric J.D. Rogers
ERIC J.D. ROGERS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing NOTICE TO TAKE VIDEOTAPED 30(B)(6) DEPOSITION with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

R. Scott Masterson
J. Marshall “Buzz” Wehunt
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Atlanta, Georgia 30309

Dated on February 23, 2018.

By: /s/ Eric J.D. Rogers
ERIC J.D. ROGERS